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FILED & ENTERED

SEP 18 2025

CLERK U.S. BANKRUPTCY COURT
Central District of California
BY bolte DEPUTY CLERK

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Possession

CHANGES MADE BY COURT

UNITED STATES BANKRUPTCY COURT

CENTRAL DISTRICT OF CALIFORNIA- SANTA ANA DIVISION

In re:

THE ORIGINAL MOWBRAY'S TREE
SERVICE, INC., a Delaware corporation,

Debtor and Debtor-in-Possession.

Case No.: 8:24-bk-12674-SC

Chapter: 11

(Jointly Administered with Case Nos.
8:25-bk-10542-SC and 8:25-bk-10543-SC)

In re:

MOWBRAY WATERMAN PROPERTY,
LLC,

Debtor and Debtor-in-Possession.

**ORDER (1) APPROVING SECOND
AMENDED DISCLOSURE
STATEMENT DESCRIBING SECOND
AMENDED JOINT CHAPTER 11
PLAN OF REORGANIZATION; AND
(2) CONTINUING STATUS
CONFERENCE**

In re:

ROBIN ELAINE MOWBRAY,

Debtor and Debtor-in-Possession.

Disclosure Statement Hearing:

Date: September 10, 2025

Time: 1:30 p.m.

Ctrm: 5C

411 W Fourth Street
Santa Ana, CA 92701

- ☐ Affects THE ORIGINAL MOWBRAY
TREE SERVICE, INC.
- ☐ Affects MOWBRAY WATERMAN
PROPERTY, LLC
- ☐ Affects ROBIN ELAINE MOWBRAY
- ☒ Affects All Debtors

Plan Confirmation Hearing:

Date: February 18, 2026
Time: 1:30 p.m.
Ctrm: 5C
411 W Fourth Street
Santa Ana, CA 92701

Continued Status Conference:

Date: February 18, 2026
Time: 1:30 p.m.
Ctrm: 5C
411 W Fourth Street
Santa Ana, CA 92701

On September 10, 2025, at 1:30 p.m., the above-captioned Court held a hearing (the "**Disclosure Statement Hearing**") on the adequacy of the Disclosure Statement (as defined below) filed by The Original Mowbray's Tree Service, Inc. ("**MTS**"), Mowbray Waterman Property, LLC ("**MWP**"), and Robin Elaine Mowbray ("**Robin Mowbray**" and collectively with MTS and MWP, the "**Debtors**"), the debtors and debtors-in-possession in the above-captioned jointly administered cases, and a status conference. Robert S. Marticello and Michael L. Simon of Raines Feldman Littrell LLP appeared on behalf of MTS. Roye Zur of Elkins Kalt Weintraub Reuben Gartside LLP appeared on behalf of MWP and Robin Mowbray. All other appearances were as noted on the record.

On August 13, 2025, the Debtors filed the *First Amended Disclosure Statement Describing First Amended Joint Chapter 11 Plan of Reorganization* [Docket No. 693] (the "**FADS**"), the *Index of Exhibits In Support of First Amended Joint Disclosure Statement Describing First Amended Joint Chapter 11 Plan of Reorganization* [Docket No. 697] (the "**Index**"), and the *First Amended Joint Chapter 11 Plan of Reorganization* [Docket No. 695] (the "**FAP**"). On September 3, 2025, Ronnie Jordan filed an objection to the FADS [Docket No. 798] (the "**Jordan Objection**"). On September 9, 2025, the Debtors filed a reply to the Jordan Objection [Docket No. 826] (the "**Reply**").

At the Disclosure Statement Hearing, the Court approved the Disclosure Statement (as defined below) with the amendments reflected in the Reply and a modification stated on the record during the Disclosure Statement Hearing to be incorporated into a further revised

1 Second Amended Disclosure Statement (the "**Second Amended Disclosure Statement**") and
2 Second Amended Plan (the "**Second Amended Plan**") to be filed by September 19, 2025,
3 with notices of redlines of the Second Amended Disclosure Statement relative to the FADS
4 and of the Second Amended Plan relative to the FAP (collectively, the "**Notice of**
5 **Redlines**").

6 The Second Amended Disclosure Statement, as may be further modified or revised
7 consistent with this Order, shall be referred to as the "**Disclosure Statement.**" The Second
8 Amended Plan, as may be further modified or revised with this Order, shall be referred to as
9 the "**Plan.**" Capitalized terms not expressly defined herein shall have the meanings ascribed
10 to them in the Disclosure Statement.

11 Having considered the Disclosure Statement, the Reply, and all other pleadings filed
12 in support thereof (*see* Docket No. 825), the Jordan Objection and all other pleadings filed in
13 opposition, objection, or response to the Disclosure Statement, the statements of counsel
14 made on the record at the Disclosure Statement Hearing, and finding that notice and service
15 were proper, sufficient cause appearing therefor, and for the reasons stated on the record,

16 **IT IS HEREBY ORDERED** that:

17 1. The Disclosure Statement is **APPROVED** as containing adequate information
18 as required by 11 U.S.C. § 1125.

19 2. The hearing to consider the confirmation of the Plan is scheduled for
20 **February 18, 2026, at 1:30 p.m.** (the "**Plan Confirmation Hearing**").

21 3. On or before **September 19, 2025**, the Debtors shall file the Second Amended
22 Disclosure Statement, the Second Amended Plan, and the Notice of Redlines;

23 4. On or before **September 19, 2025**, the Debtors shall cause the following to be
24 transmitted by first class mail to (a) all known creditors who have timely filed a proof of
25 claim in these Cases or who are listed in the Debtors' bankruptcy schedules, including any
26 amendments thereto, (b) all parties to any remaining executory contracts or unexpired leases
27 with the Debtors according to the Debtors' bankruptcy schedules, including any amendments
28

1 thereto, (c) all parties who have requested special notice, and (d) counsel for the United
2 States Trustee:

- 3 a. Notice of the Plan Confirmation Hearing, which shall include notice of
4 the deadlines to object to confirmation of the Plan and the deadline to
5 return ballots accepting or rejecting the Plan;
- 6 b. The Disclosure Statement, the Plan, and all accompanying exhibits;
- 7 c. This Order; and
- 8 d. If the party is entitled to vote on the Plan, an appropriate form of ballot
9 with appropriate voting instructions.

10 5. Ballots accepting or rejecting the Plan must be returned so that they are
11 actually received by MTS's counsel, Raines Feldman Littrell LLP, Attn: Michael L. Simon,
12 4675 MacArthur Court, Suite 1550, Newport Beach, CA 92660, msimon@raineslaw.com, by
13 no later than **October 24, 2025, at 5 p.m. Pacific Time.**

14 6. Any responses, oppositions, or objections to confirmation of the Plan shall be
15 filed with the Court and served on MTS's counsel, Raines Feldman Littrell LLP, Attn: Robert
16 S. Marticello, 4675 MacArthur Court, Suite 1550, Newport Beach, CA 92660, and counsel
17 for MWP and Robin Mowbray, Elkins Kalt Weintraub Reuben Gartside LLP, Attn: Roye
18 Zur, 10345 W. Olympic Blvd., Los Angeles, CA 90064, by no later than **January 16, 2026.**

19 7. The Debtors shall file with the Court and serve on counsel for the United
20 States Trustee a memorandum in support of confirmation of the Plan (the "**Confirmation**
21 **Memo**"), a tabulation of votes on the Plan, and any declaration(s) or other evidence in
22 support of confirmation of the Plan by no later than **February 5, 2026.**

23 8. Any reply to the Confirmation Memo shall be filed with the Court and served
24 on MTS's counsel, Raines Feldman Littrell LLP, Attn: Robert S. Marticello, 4675 MacArthur
25 Court, Suite 1550, Newport Beach, CA 92660, and counsel for MWP and Robin Mowbray,
26 Elkins Kalt Weintraub Reuben Gartside LLP, Attn: Roye Zur, 10345 W. Olympic Blvd., Los
27 Angeles, CA 90064, by no later than **February 13, 2026.**

1 9. Prior to the dissemination of the Disclosure Statement as provided herein, the
2 Debtors shall have the authority to make modifications to the Disclosure Statement, the Plan,
3 and the related documents and papers, so long as such modifications are non-substantive,
4 typographical, conforming and/or ministerial in nature or are to incorporate the revisions to
5 the Disclosure Statement approved by the Court, without further notice or order of the Court.

6 10. Parties shall disclose the identity, by a notice filed with the Court, of any
7 declarant or witness it may use in connection with the Plan Confirmation Hearing to offer
8 expert testimony by no later than September 17, 2025.

9 11. Parties shall serve any and all discovery related to the Plan Confirmation
10 Hearing by no later than October 17, 2025 and may serve such discovery by email.

11 12. Objections or other written responses, or documents that must be produced in
12 response, to any discovery served in accordance with Paragraph 11 of this Order shall be
13 served or produced, as applicable, by November 20, 2025.

14 13. Any depositions related to the Plan Confirmation Hearing shall be conducted
15 by December 19, 2025.

16 14. Expert reports shall be filed by no later than December 11, 2025.

17 15. The Debtors may agree to modify or extend the dates and deadlines in
18 paragraphs 10 through 14 of this Order as to any particular counterparty by written
19 agreement with such counterparty without the need for a further order.

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